1 **GIBSON, DUNN & CRUTCHER LLP**
   LAUREN R. GOLDMAN (*pro hac vice*)
2 lgoldman@gibsondunn.com
   DARCY C. HARRIS (*pro hac vice*)
3 dharris@gibsondunn.com
   200 Park Avenue
4 New York, NY 10166
   Telephone: (212) 351-4000
5 Facsimile: (212) 351-4035

6 ELIZABETH K. MCCLOSKEY, SBN 268184
   emccloskey@gibsondunn.com
7 ABIGAIL A. BARRERA, SBN 301746
   abarrera@gibsondunn.com
8 One Embarcadero Center, Suite 2600
   San Francisco, CA 94111
9 Telephone: (415) 393-8200
   Facsimile: (415) 393-8306
10
   NATALIE J. HAUSKNECHT (*pro hac vice*)
11 nhausknecht@gibsondunn.com
   1900 Lawrence Street Suite 3000
12 Denver, CO 80202
   Telephone: (303) 298-5783
13 Facsimile: (303) 313-2800

14

15 *Attorneys for Defendant Meta Platforms, Inc.*

16

17   **UNITED STATES DISTRICT COURT**

18   **NORTHERN DISTRICT OF CALIFORNIA**

19   **SAN JOSE DIVISION**

20
   IN RE META PIXEL TAX FILING CASES   Case No. 5:22-cv-07557-PCP (VKD)
21
                                              **[PROPOSED] ORDER GRANTING
22   DEFENDANT'S ADMINISTRATIVE
                                              MOTION TO FILE UNDER SEAL**
23 This Document Relates To:
                                              Hon. P. Casey Pitts
24 All Actions

25

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27

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Gibson, Dunn &
Crutcher LLP

1   Having considered the Administrative Motion to File under Seal and the Declaration of

2   Lauren R. Goldman, filed by Meta Platforms, Inc. on November 26, 2025, pursuant to Civil Local

3   Rule 79-5, all materials submitted in support thereof, and other records on file, and having found that

4   good cause exists for the sealing of the documents listed below:

5   **IT IS HEREBY ORDERED** that parts of the Corrected Appendix to the Expert Rebuttal

6   Report of Georgios Zervas, Ph.D (the "Appendix"), which was filed on November 26, 2025 be

7   **SEALED** as outlined below. Accordingly, the public shall only have access to the version of the

8   Appendix that has the following redactions:

Document	Portions of Document to Be Sealed	Designating Party	Reason for Redaction
Appendix to the Rebuttal Expert Report of Georgios Zervas, PhD	Parts of page D-14, paragraphs 21-23.	Meta	This text should be redacted because it reveals specific, non-public information about highly confidential Source Code, including how the Source Code can be queried. If this information were disclosed, it would competitively harm Meta and allow bad actors to undermine the integrity of Meta's systems.

Dated: _____

_____
P. Casey Pitts
United States District Court Judge